

**RECEIVED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

**FEB 22 2022**

**FLORENCE, S.C.**

**UNITED STATES OF AMERICA**

**v.**

**CLAYTON THOMAS, JR.,  
a/k/a "CJ"**

Criminal No.: **2:22-cr-138**

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 924(d)(1)

28 U.S.C. § 2461(c)

**SEALED INDICTMENT**

**COUNTS 1 – 7**  
**(False Statement to FFL)**

**THE GRAND JURY CHARGES:**

That on or about the dates reflected below, in the District of South Carolina, the Defendant, **CLAYTON THOMAS, JR., a/k/a "CJ,"** did knowingly make a false statement in connection with the acquisition and attempted acquisition of the firearms listed below from the licensed dealer listed below, which was intended and likely to deceive the said dealer with respect to a fact material to the lawfulness of the sale and disposition of the firearm under the provisions of Chapter 44 of Title 18, United States Code, in that the Defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the true purchaser of the firearm listed below, whereas in truth and in fact, he was not the true purchaser:

| <b>COUNT</b> | <b>DATE<br/>PURCHASED</b> | <b>FIREARM<br/>PURCHASED</b>                  | <b>LICENSED DEALER</b>                      |
|--------------|---------------------------|-----------------------------------------------|---------------------------------------------|
| 1            | June 3, 2020              | Glock, model 43,<br>9mm pistol                | Gene's Jewelry & Pawn<br>(North Charleston) |
| 2            | July 6, 2020              | Glock, model 30,<br>.45 caliber pistol        | A.T.P. Gun Shop and Range<br>(Summerville)  |
| 3            | Oct 23, 2020              | FN Five-Seven<br>pistol                       | Palmetto State Armory<br>(Summerville)      |
| 4            | Nov 24, 2020              | Smith and<br>Wesson, model<br>SD9, 9mm pistol | A.T.P. Gun Shop and Range<br>(Summerville)  |
| 5            | June 22, 2021             | Glock, model 26,<br>9mm pistol                | A.T.P. Gun Shop and Range<br>(Summerville)  |
| 6            | July 31, 2021             | Taurus, model<br>G2C, 9mm pistol              | A.T.P. Gun Shop and Range<br>(Summerville)  |
| 7            | October 13, 2021          | Glock, model 19,<br>9mm pistol                | A.T.P. Gun Shop and Range<br>(Summerville)  |

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE

FIREARM OFFENSES:

Upon conviction for the felony violation of Title 18, United States Code, Section 922(a)(6) as charged in this Indictment, the Defendant, **CLAYTON THOMAS, JR., a/k/a "CJ,"** shall forfeit to the United States all of the Defendant's rights, title, and interest in:

- (a) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
  - (1) involved in or used in any knowing violations of 18 U.S.C. § 922, or violation of any other criminal law of the United States, or intended to be used in a crime of violence.

PROPERTY:

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offenses charged in this Indictment includes, but is not limited to, the following:

A. Firearms:

- (1) Glock, model 19, 9mm caliber pistol  
Serial Number: AFNW098  
Firearm recovered on 12/15/2021 by the Dorchester County Sheriff's Office
- (2) Taurus, model G2C, 9mm pistol  
Serial Number: ACE884559  
Possessor: Dwonenrius Washington  
Firearm recovered on 8/28/2021 by the North Charleston Police Department
- (3) Smith and Wesson, model SD9, 9mm pistol  
Serial Number: FCJ6423  
Possessor: Ricardo Brown  
Firearm was recovered on 11/24/2020 by the Charleston Police Department

- (4) FN Five-Seven pistol  
Serial Number: 386395645  
Possessor: Levar Daniels  
Firearm recovered on 9/15/2021 by the Berkeley County Sheriff's Office
- (5) Glock, model 30, .45 caliber pistol  
Serial Number: BNGT191  
Possessor: Edwin Roland Orantes Torres  
Firearm recovered on 11/13/2020 by the North Charleston Police
- (6) Glock, model 43, 9mm pistol  
Serial Number: ADXA478  
Possessor: Derrick Bashad Scott  
Firearm recovered on 7/8/2021 by the North Charleston Police

B. Ammunition:


- (1) Miscellaneous rounds of 9mm ammunition
- (2) Miscellaneous rounds of 5.7x28mm caliber ammunition
- (3) Miscellaneous rounds of .45 caliber ammunition

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

A TRUE Bill

  
FOREPERSON

COREY F. ELLIS  
UNITED STATES ATTORNEY

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